

REMARKS

Claims 1, 3-12 and 14-15 are all the claims pending in the application.

I. Claim Rejections Under 35 USC § 103

1. Claims 1, 3-5, 7-12 and 14-15

The Examiner rejected claims 1, 3-5, 7-12 and 14-15 under 35 USC § 103(a) as being unpatentable over Shen (US 2004/0013120 A1), in view of Killian (US 6,064,671).

The Applicant respectfully disagrees, and submits that Shen and Killian, taken alone or in combination, fail to disclose the claimed invention. Furthermore, neither Shen nor Killian provide any teaching, suggestion or motivation that would arrive at the invention embodied by the pending claims.

In the Office Action, the Examiner states, in relevant part, that Shen teaches a method that comprises “providing at least one second routing table defining a second destination, *wherein the second destination is individually associated with said at least one second network adapter* (providing a second routing table 407A for VR-B defining external destination ED2 associated with interface I/F4 as illustrated in Fig. 4)...” *Office Action*, p. 3 (emphasis added).

The Applicant respectfully disagrees, and submits that Shen fails to teach where “the second destination is *individually associated* with said at least one second network adapter,” as recited in claim 1. The Applicant refers the Examiner to the Specification, at p. 15, referencing Fig. 3, which states “*each* routing table 60, 62 is *individually associated* with *one* of network adapters 20, 22, 24, and it preferably names the respective network adapter in the interface field

of its corresponding default destination route. Therefore, *each* network adapter can be accessed from an application 46 as *a default destination* route by selecting the appropriate routing table 60, 62.” (emphasis added). The ability for each network adapter to be accessed as a default destination simplifies the connection process and the management of routing tables that can otherwise become exceedingly complex, for reasons discussed in the Specification from pages 14-15.

Shen, in contrast, does not teach or describe *individually associating* a destination with a specific network adapter, such that each network adapter can be accessed by an application as a default destination route by selecting the appropriate routing table. Shen simply describes the use of a second routing table (407A) with a second destination (ED2) that is associated with an interface I/F4, but Shen does not disclose that this is an *individual association* between a destination and one particular interface, such that an application can specifically choose a particular routing table if connection using a particular interface is desired.

Therefore, the Applicant submits that Shen fails to teach “wherein the second destination is individually associated with said at least one second network adapter,” as recited in claim 1. As Killian also fails to teach such an association, the Applicant submits that Killian and Shen cannot be combined to teach the elements of claim 1.

The Examiner admits that Shen does not explicitly teach where the first and second routing tables define said first and second destinations as default destinations which are used for traffic relay in any default situation. *Office Action*, p. 4. However, the Examiner cites to Killian as teaching that all routing tables should include a default entry. The Examiner then concludes

that it would have been obvious to one having ordinary skill in the art to incorporate the features of default destinations as recited in Killian with the teachings of Shen to arrive at the claimed invention.

The Applicant respectfully disagrees, and points out that the Specification, at p. 14, defines a default destination in a routing table as is known in the art. However, the Specification then describes the limitations of a situation where a single routing table contains only a single default destination, since only one network adapter can be associated with the default route. Killian, in contrast, fails to describe any limitations of the use of a routing table with a default destination. In fact, Killian discusses the use of a default destination as an essential part of a routing table, without mentioning any limitations of its use. Therefore, Killian provides no motivation to combine the use of a default destination with the teachings of Shen to arrive at the claimed invention.

Furthermore, Shen also fails to describe any limitation of the use of its routing tables without a default destination. Shen fails to mention a default destination entirely, and therefore also lacks any motivation to combine with the teachings of Killian to arrive at the claimed invention.

For at least the reasons stated above, the Applicant submits that neither Shen nor Killian, taken alone or in combination, disclose, teach, suggest or provide any motivation for the claimed invention. As such, the Examiner respectfully requests that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

In addition, the Applicant submits that claims 3-5 are allowable at least based on their dependency to claim 1.

Furthermore, as claims 7, 9-11 and 14 all similarly recite the elements of individually associating a destination with a specific network adapter and the use of a default destination, the Applicant submits that claims 7-12 and 14-15 are allowable for at least the same reasons stated above with regard to claim 1. Claims 8, 12 and 15 are also allowable at least based on their dependency to claims 7, 11 and 14, respectively.

2. Claim 6

The Examiner rejected claim 6 under 35 USC § 103(a) as being unpatentable over Shen-Killian, in view of Zhou (US 2002/0138578).

The Applicant submits that claim 6 is allowable at least based on its dependency to claim 1, and respectfully requests that the rejection under 35 U.S.C. § 103(a) be withdrawn.

II. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111
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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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